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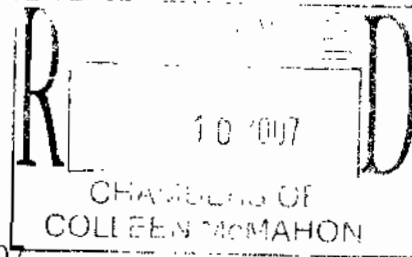
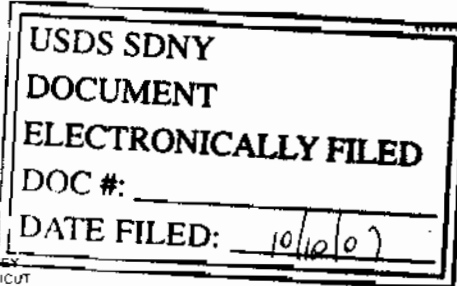
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MEMO ENDORSED



October 9, 2007

Our Ref: 435-07/MEU

BY HAND

The Honorable Colleen McMahon
Daniel Patrick Moynihan U.S. Courthouse
5000 Pearl Street, Room 640
New York, New York 10007

advised since 10/10/07
Colleen McMahon
10/10/07

Re: JS Ocean Liners, Inc. v. Dao Construction Pty Ltd., 07-7851 (CM)

Dear Judge McMahon:

We represent the Plaintiff in connection with the above-referenced action. We write to request an adjournment of the initial status conference that is scheduled for October 11, 2007 at 2:45 p.m.

Plaintiff initiated this action on September 6, 2007 seeking security, in the sum of \$131,843.73 for its maritime claim (following the issuance of a London final arbitration award in Plaintiff's favor) via an attachment of Defendant's property in this District pursuant to Rule B. Your Honor granted Plaintiff's application on the same day. Despite continued efforts, Plaintiff has not been successful in restraining any assets of the Defendant, although it continues to effect daily service of the Process of Maritime Attachment and Garnishment upon various New York banks. We note that Local Admiralty Rule B.2 recognizes the importance of keeping Rule B actions *ex parte* until property is actually restrained, and provides that notice of attachment is not required to be given to the Defendant until after its property has been restrained. As no assets have been captured, the Defendant therefore has not received notice of the upcoming conference.

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In light of the foregoing considerations, we therefore respectfully request that Your Honor grant the within application and adjourn the October 11 conference.

Respectfully submitted,

FREEHILL HOGAN & MAHAR, LLP

A handwritten signature in black ink, appearing to read "Mantel A. Molina". The signature is fluid and cursive, with the first name "Mantel" being more prominent.

Mantel A. Molina